

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)

THIS DOCUMENT RELATES TO:
ALL CASES

$$\begin{pmatrix}) \\) \\) \\) \\) \\) \\) \end{pmatrix}$$

**DECLARATION OF SOLOMON B. CERA IN SUPPORT OF JOINT MOTION
FOR MODIFICATION OF SCHEDULE
RELATING TO LEAD PLAINTIFF'S CLASS CERTIFICATION MOTION**

I, Solomon B. Cera, declare:

1. I am a partner of Gold Bennett Cera & Sidener LLP, counsel for lead plaintiff BPI Global Asset Management LLP. I submit this declaration in support of the joint motion for a modification of the dates set forth in this Court's July 27, 2006 Scheduling Order regarding class certification proceedings. The matters stated herein are true of my own personal knowledge and, if called upon to testify thereto, I could and would competently do so.

2. The Scheduling Order approved of the schedule agreed upon by the parties as reflected in their July 6, 2006 Joint Statement. In accordance with the schedule, Lead Plaintiff timely filed its class certification motion on July 31, 2006. Subsequent thereto, defendants have served Lead Plaintiff with a Rule 34 document request consisting of 39 requested categories of documents for class certification issues, a set of interrogatories consisting of 11 questions (not counting subparts), and have issued a Rule 30(b)(6) deposition notice which identified nineteen (19) areas of inquiry to be explored in deposition. Lead Plaintiff has timely responded to each of the foregoing discovery requests. The parties have also been engaged in a series of meet and confers to attempt to resolve objections and disagreements about certain of the discovery requests. Additional time is required to allow the parties to attempt to resolve these disagreements, and so that any appropriate depositions occur only after all document related issues and disputes are resolved.

3. Certain merits based discovery has been ongoing at the same time as class-related discovery, including document production by the defendants and third parties.

4. All parties are in agreement with the revised proposed schedule set forth in the accompanying motion.

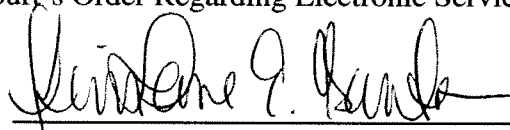
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of September 2006.

/s/Solomon B. Cera

Solomon B. Cera

CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby certify that on September 29, 2006, I caused a true and correct copy of the aforementioned **“DECLARATION OF SOLOMON B. CERA IN SUPPORT OF JOINT MOTION FOR MODIFICATION OF SCHEDULE RELATING TO LEAD PLAINTIFF’S CLASS CERTIFICATION MOTION”** to be served on counsel of record by electronic service pursuant to the Court’s Order Regarding Electronic Service.

A handwritten signature in black ink, appearing to read "KimLane E. Gantan", is written over a horizontal line.

KimLane E. Gantan